



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

February 22, 2016

M. Earle Stewart, Supervisor, Tongass National Forest
Attn: Forest Plan Amendment
648 Mission Street
Ketchikan, Alaska 99901

Dear Mr. Stewart:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Tongass Land and Resource Management Plan Amendment, Tongass National Forest, in southeast Alaska (EPA Project #14-0026-AFS). We have reviewed the Draft EIS in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Specifically Section 309 directs EPA to review and comment in writing on the environmental impacts of major federal agency actions. Our review considered the evaluation of the anticipated environmental impacts, as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

Based on our review, we have assigned the Draft EIS a rating of EC-2 (Environmental Concerns-Insufficient Information). We believe that the most recent, southeast Alaska-specific data and information should be incorporated into the climate and greenhouse gas analyses and discussion in the final EIS. An explanation of our rating system is enclosed (Enclosure 1). In general, we support the selection of the Forest Service and Technical Advisory Committee's preferred alternative, Alternative 5. We believe Alternative 5 meets the direction of Secretarial Memorandum 1044-009 by accelerating the transition to young-growth, while also providing greater flexibility for alternative energy projects, and appropriate review of inventoried roadless areas.

We appreciate the inclusion of a "track changes" version of the 2008 Forest Plan and the scoping and comment summary report (Appendix A) in the Draft EIS. These resources greatly facilitated our review. An Executive Summary would also have been helpful, especially to stakeholders who might not be able to review the full document. We recommend that an Executive Summary be included in the Final EIS.

As we stated in our scoping comments, we support appropriate updates to standards and guidelines that reflect the most recent management science regarding ecological services, climate change and resiliency. We also recognized the need for adequate socioeconomic analysis to promote the sustainability of Southeast Alaska communities, particularly tribal, low income and minority communities, dependent on timber harvesting and other activities on the Tongass. We believe the Tongass Amendment EIS adequately accomplishes this through the thorough analyses and evaluation of management alternatives, resources and projected outcomes and goals. We also appreciate that a broad range of potential activity types, such as communication sites, renewable power projects, and mining, as well as timber harvest were considered in this programmatic document. We believe doing so allows for greater disclosure to and participation of stakeholders, potential permittees and forest users.

Finally, we have recommendations for your consideration in the area of climate change and greenhouse gas emissions in the Final EIS. We appreciate the thorough discussion in the Draft EIS of the various factors that affect and drive climate in southeast Alaska. We also recognize that, in addition to the USDA Secretarial Memorandum 1044-009, another primary driver for undertaking this Forest Plan amendment is to consider changes in forest management and health as a consequence of a changing climate.

We believe the Affected Environment section contains adequate discussion of climate inputs and possible anthropogenic effects on climate. We recommend, however, that the most recent sources of data for Alaska be used wherever possible. For example, our own Climate Impacts in Alaska website (<http://www3.epa.gov/climatechange/impacts/alaska.html>) references the 2014 National Climate Assessment (<http://nca2014.globalchange.gov/report/regions/alaska#intro-section>), which states Alaska temperatures have increased approximately 3 degrees F in the last 60 years. Also, current data from The Alaska Climate Research Center indicates that while total mean seasonal and annual temperatures in Alaska from 1959 to 2014 reflect an increase in temperature, temperatures from 1979 to 2014 generally show a decline in mean seasonal and annual temperatures (<http://akclimate.org/ClimTrends/Change/TempChange.html>) in most of Alaska, including southeast Alaska. This trend, along with increased ice extent in the Bering Sea, differs from trends identified in the Arctic, such as increased temperatures and decreased overall Arctic ice extent. We believe assessment of climate change for the Tongass should be as specific to southeast Alaska as practicable.

The Final EIS might also consider the following additional factors for incorporation into the relevant air quality and climate change sections of the main document, or as an appendix. These include quantification of GHG emissions from the proposed action and appropriate quantitative or qualitative analytical methods to ensure useful information is available to inform the public and the decision-making process in distinguishing between alternatives and mitigations.

Thank you again for the opportunity to review the Draft Environmental Impact Statement for the Tongass Land and Resource Management Plan Amendment. Please contact Jennifer Curtis of my staff in Anchorage at 907-271-6324 or curtis.jennifer@epa.gov with any questions you may have.

Sincerely,



Christine B. Littleton, Manager
Environmental Review and Sediments Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System For Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.